

Meng Zhong
Nevada Bar No. 12145
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Pkwy., Ste. 600
Las Vegas, Nevada 89169
Telephone No. 702.949.8200
mzhong@lewisroca.com

Scott W. Johnston (admitted *Pro Hac Vice*)
MERCHANT & GOULD P.C.
150 South Fifth Street, Suite 2200
Minneapolis, MN 55402
Telephone No. 612.332.5300
Facsimile No. 612.332.9081
sjohnston@merchantgould.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ECOLAB USA INC.,
Plaintiff

v.

PRO-POINT, INC. D/B/A GO CLEAN
CHEMICAL, MARSH AND MARSH
LLC, RICHARD MARSH, LYNNE
MARSH, and SHAWN MARSH,
Defendants

Case No. 2:23-cv-02097-CDS-EJY

**STIPULATION OF VOLUNTARY
DISMISSAL OF CERTAIN PARTIES**

PLAINTIFF ECOLAB USA, INC., by and through its attorneys, the law firms of Merchant & Gould P.C. and Lewis Roca Rothgerber Christie LLP, and DEFENDANTS PRO-POINT, INC., D/B/A GO CLEAN CHEMICAL, MARSH AND MARSH, LLC, RICHARD MARSH, LYNNE MARSH, and SHAWN MARSH (“Defendants”), by and through their attorneys, the law firm of MORTENSON & RAFIE, LLP, hereby stipulate and agree to the dismissal of Defendants Marsh and Marsh, LLC, Richard Marsh, Lynne Marsh, and Shawn Marsh as parties to this action without prejudice. Defendants have not filed an answer or a motion for summary judgment.

The action will continue as to the remaining Defendant, Pro-Point, Inc.

DATED this 21st day of March, 2024.

DATED this 21st day of March, 2024.

MORTENSON & RAFIE, LLP

**LEWIS ROCA ROTHGERBER
CHRISTIE LLP**

/s/ Darius F. Rafie

/s/ Meng Zhong

Darius F. Rafie, Esq.
Nevada Bar No. 6465
10781 W. Twain Avenue
Las Vegas, NV 89135
Ph: 702-363-4190
Email: manager@nvlaw.us

Meng Zhong
Nevada Bar No. 12145
3993 Howard Hughes Pkwy., Ste. 600
Las Vegas, NV 89169
Ph: 702-949-8200
Email: mzhong@lewisroca.com

*Attorney for Pro-Point, Inc., d/b/a
Go Clean Chemical, Marsh And
Marsh, LLC, Richard Marsh,
Lynne Marsh, And Shawn Marsh*

Scott W. Johnston
MERCHANT & GOULD P.C.
150 South Fifth St., Ste. 2200
Minneapolis, MN 55402
Ph: 612-332-5300
sjohnston@merchantgould.com

Attorneys for Ecolab USA Inc.

Based on the parties' stipulation, defendants Marsh and Marsh, LLC, Richard Marsh, Lynne Marsh, and Shawn Marsh are dismissed without prejudice.


UNITED STATES DISTRICT JUDGE

DATED: March 25, 2024